



Michael J. McFarland, Esq.
mmcfarland@laffeybuccikent.com
(215)-399-9551

June 8, 2023

Submitted via ECF

Honorable Michael A. Hammer, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

RE: Request to Change Scheduling Order
Doe v. Rutgers, et al., Civil Action No. 21-20763 (D.N.J.)

Dear Judge Hammer,

On behalf of Plaintiff Veronica Doe, and with the consent of counsel for Defendant Rutgers University and Scott Strother, we respectfully request a modification to the Amended Scheduling Order (ECF No. 63).

The parties are working in good faith to complete expert discovery. The parties have exchanged all expert reports and have completed the deposition of all of Plaintiff's experts as well as one of Defendants' witnesses. The parties are respectfully requesting additional time to complete the depositions of the remaining defense experts, which will be scheduled and completed in the coming weeks. Accordingly, the parties request that the expert deposition deadline be extended from June 8, 2023, to July 1, 2023. We also would respectfully request a telephonic status conference with the Court on July 12, 2023.

We thank the Court for its consideration of this request. If the Court has any questions for counsel, we are available to respond at the Court's convenience.

The deadline to complete expert discovery is extended until July 1, 2023. The next telephone conference shall take place
SO ORDERED on July 12, 2023 @ 2:30pm.

s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: 6/9/2023

Respectfully Submitted,
s/ Michael J. McFarland
Michael J. McFarland, Esq.
LAFFEY, BUCCI & KENT, LLP
1100 Ludlow Street, Suite 300
Philadelphia, PA 19107
T: 215-399-9255
F: 215-857-0075
mmcfarland@laffeybuccikent.com

Counsel shall dial
1-888-684-8852 and
enter access code
1456817* to join
the call.

LAFFEY BUCCI KENT

LLP

llb@laffeybuccikent.com

TRIAL LAWYERS

/s/ Laura L. Dunn, Esq.

Laura L. Dunn, Esq. (*pro hac vice*)

L.L. DUNN LAW FIRM, PLLC

1717 K Street NW, Suite 900

Washington D.C. 20006

T: 202-822-5023

F: 202-776-0136

LLD@LLDunnLaw.com